

**AFFIDAVIT**

I, Nathan Schwartz, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (S/A) of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since May 2020. I was previously employed as a Police Officer (PO) for the Columbus, Ohio Division of Police beginning in June 2013. I have completed the Peace Officer Training Academy at the Columbus, Ohio Division of Police Training Academy, the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia and the Special Agent Basic Training Program at the ATF National Academy in Glynco, Georgia. I have received training in the enforcement of the various criminal statutes enacted in the Gun Control Act of 1968 and in the National Firearms Act of 1934 and Title 21, U.S.C., Section 841(a)(1).

2. I am presently assigned as a Special Agent for the ATF Columbus Field Division's Cleveland Group IV. As a PO for the Columbus, Ohio Division of Police and as an S/A for the ATF I have participated in federal and state investigations involving the sale, possession and trafficking of firearms and controlled substances. During these investigations, I have become familiar with various investigative techniques, including electronic surveillance, the use of undercover agents and informants, and controlled purchases of firearms and narcotics from suspects. I have participated in investigations with an undercover agent purchasing firearms and narcotics from suspects. I have also participated in physical surveillance operations and the execution of state and federal arrest warrants and search warrants, resulting in state and federal prosecution of defendants. In addition to utilizing the aforementioned investigative techniques, I have been required during these investigations to analyze information resulting from traditional

record searches, pen registers and trap-and-trace devices, cell phone and cell site location information, precision cell phone location data, utility records, and telephone toll and subscriber records. My work with informants and cooperators has involved, among other things, monitoring meetings and recorded conversations, and generally evaluating the reliability and truthfulness of an informant/cooperator. Because of my training and experience, I have become familiar with the manner in which illegal firearm and drug traffickers smuggle, transport, store, conceal and distribute firearms and drugs, as well, as how they collect, and launder proceeds related to such activities. I am also familiar with the manner in which these individuals use telephones, coded communications, false or fictitious identities, and other means to facilitate illegal activities and thwart law enforcement investigations. I have also consulted and discussed the investigations with other law enforcement officers and agents who are experienced in these types of investigations.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 21 U.S.C. §§ 841(a)(1) and 846 (that is, Possession with Intent to Distribute and Distribution of Controlled Substance, and Conspiracy to Commit the Same), and 18 U.S.C. § 924(c) (that is, Possession of Firearm in Furtherance of Drug Trafficking Crime or Crime of Violence), have been committed, are being committed, and will be committed by **Derrick WILLIAMS, Markus WILLIAMS, Maurice COMMONS, Antonio SWEENEY and Alante HEARD.**

### **Case Initiation**

5. On June 26, 2023, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agents (SA) Nathan Schwartz, SA Gerrod Briggs, SA Russell Johnson, SA Erik Kocinski, SA Pat Higgins and SA Brian Middaugh debriefed ATF Confidential Informants (CI) 11994 and 17813 regarding their initial contact with Derrick WILLIAMS (B/M, 08/01/1984, XXX-XX-7562), Brandon WILLIAMS (B/M, 10/09/1985, XXX-XX-9119), Antonio SWEENEY (B/M, 11/20/1998, XXX-XX-3158) and Thorne HENLEY (B/M, 06/12/1997, XXX-XX-5133).

- a. CI 11994 is cooperating with law enforcement in exchange for monetary payment. I believe CI 11994's information is reliable because their information has been corroborated by an independent investigation, including controlled drug buy(s) and subsequent undercover meetings that were recorded by law enforcement. CI 11994 has never provided information that was determined to be deliberately false or misleading. CI 11994 has also cooperated in other investigations, which led to search warrants, arrests, convictions, drug seizures, and gun seizures. CI 11994 has a criminal history that includes trafficking in stolen property, malicious mischief, theft of a motor vehicle, assault, unlawful possession of a firearm, residential burglary, and custodial assault.
- b. CI 17813 is cooperating with law enforcement in exchange for monetary payment. I believe CI 17813's information is reliable because their information has been corroborated by an independent investigation, including controlled drug buy(s) and subsequent undercover meetings that

were recorded by law enforcement. CI 17813 has never provided information that was determined to be deliberately false or misleading. CI 17813 has also cooperated in other investigations, which led to search warrants, arrests, convictions, drug seizures, and gun seizures. CI 17813 has a criminal history that includes possession of cocaine, criminal damage, aggravated assault, reckless conduct, obstructing justice, armed robbery, unlawful possession of a weapon, and possessing firearm in public.

6. CI 11994 and 17813 stated that they originally met Thorne Henley, also known as “Money” or “King Henley” in or around the middle of June 2023 at the East 72<sup>nd</sup> Fishing Area located in Cleveland, Ohio. Henley provided his phone number to the CIs, which he stated was 216-612-XXXX. CIs 11994 and 17813 stated that Henley claimed to be a member of the “Sex, Money, Murder, Blood Gang.” Henley directed the CIs to follow him to “his hood” which was later identified as an area near East 115<sup>th</sup> Street and Sellers Avenue. When the CIs arrived at East 115<sup>th</sup> Street and Sellers Avenue, they were introduced by Henley to Antonio SWEENEY, also known as “Tone.” SWEENEY provided his phone number to the CIs, which he stated was 216-237-XXXX.

7. During the contact with the CIs, SWEENEY was in possession of a Glock handgun and Henley was in possession of a Ruger handgun; both individuals were actively engaged in selling crack cocaine as well. Henley and SWEENEY explained to the CIs that there were several retail stores in the area of East 115<sup>th</sup> Street and Sellers Avenue where they (HENLEY and SWEENEY) observe suspected narcotics users, approach them, and offer to sell them crack cocaine. Henley and SWEENEY also spoke about the commitment of street

robberies and drug stash house robberies. SWEENEY informed the CIs, that if the CIs knew somebody with some “licks” that he (SWEENEY) would “take them down”. The term “licks” referenced street level drug deals or robberies.

8. On June 24, 2023, at approximately 3:00 AM, the CIs had unrecorded contact with HENLEY who directed them to respond to the area of East 115<sup>th</sup> Street and Sellers Avenue. The CIs met with Henley and SWEENEY and were introduced to individuals later identified as Derrick WILLIAMS and Brandon WILLIAMS. The CIs were told that Derrick WILLIAMS and Brandon WILLIAMS were uncles to Henley and SWEENEY. The CIs stated that Derrick WILLIAMS was the “shot caller”. HENLEY and SWEENEY spoke about committing street robberies and drug stash house robberies at which time Derrick WILLIAMS stated he would “send his boys there”. Derrick WILLIAMS provided his phone number to the CIs, which he stated was 216-414-XXXX. The CIs stated they were also introduced to Derrick WILLIAMS’ brother, later identified as Brandon WILLIAMS.

9. On June 26, 2023, the CIs were shown photographs by ATF personnel of the approximate area where the contacts occurred (near the area of East 115<sup>th</sup> Street and Sellers Avenue). The CIs stated that they met with Henley, SWEENEY, and the WILLIAMS brothers in a grass lot located on the southeast corner of East 115<sup>th</sup> Street and Sellers Avenue. The CIs stated that many individuals were in and out of the residences located at 462 East 115<sup>th</sup> Street and 467 East 115<sup>th</sup> Street. The behavior and actions the CIs described were indicative of an illegal drug trafficking operation.

#### **Intelligence regarding Derrick WILLIAMS and Brandon WILLIAMS**

10. SA Schwartz learned that Derrick WILLIAMS and Brandon WILLIAMS were co-defendants in the murder of Charles Gooden Jr. which took place on April 27, 2008, near 536

East 117<sup>th</sup> Street. Following a verbal dispute, approximately fifteen individuals stomped on and assaulted Gooden to death. Cleveland Police Department (CPD) Patrol Officers located Gooden deceased with a portion of his body inside a garbage receptacle. Investigators later determined that after Gooden was beaten to death he was urinated on. Seven individuals were charged in the murder of Gooden. These individuals pled guilty and were sentenced to prison as a result. One of the individuals who was convicted in the murder was Paris MOORE. SA Schwartz spoke with ATF Task Force Officer (TFO) Donald Kopchak who has been assigned to CPD's 5<sup>th</sup> District for an extensive period of time. TFO Kopchak was familiar with this murder and also familiar with an individual named Maceo MOORE who had criminally operated in the area near East 117<sup>th</sup> Street and Sellers Avenue for many years. TFO Kopchak advised that Paris MOORE and Maceo MOORE were brothers. Maceo MOORE was believed to be the individual who urinated on Charles Gooden Jr.'s body; however, MOORE was never criminally charged in connection with the murder. Maceo MOORE is currently serving 210 months in federal prison after pleading guilty to one count of conspiracy to possess with intent to distribute heroin. According to court documents, Maceo MOORE and others planned and committed burglaries and robberies from other drug dealers, customers, and each other. This was done to fund their drug trafficking, help them obtain heroin and other drugs, and in the collection of drug debts.

**Criminal History of D. WILLIAMS, B. WILLIAMS, and SWEENEY**

11. SA Schwartz queried Derrick WILLIAMS' criminal history via the National Crime Information Center (NCIC) and observed the following felony convictions and arrests:

**April 2003** – Trafficking in Drugs (arrested)  
**May 2003** – Burglary (arrested)  
**May 2003** – Trafficking in Drugs (convicted)  
**July 2003** – Trafficking in Drugs (convicted)  
**August 2003** – Possession of Drugs (arrested)

**November 2003** – Trafficking in Drugs (arrested)  
**August 2004** – Trafficking in Drugs (arrested)  
**January 2005** – Trafficking in Drugs (convicted)  
**January 2007** – Parole Violation (arrested)  
**January 2007** – Parole Violation (arrested)  
**December 2007** – Attempted Escape (convicted)  
**May 2008** – Aggravated Murder (convicted of Voluntary Manslaughter)  
**November 2014** – Domestic Violence (arrested)  
**November 2014** – Parole Violation (arrested)  
**November 2022** – Felonious Assault (arrested)  
**December 2022** – Felonious Assault (arrested)

12. SA Schwartz also queried the Ohio Law Enforcement Gateway (OHLEG) for information regarding Derrick WILLIAMS. SA Schwartz observed that per the Ohio Department of Rehabilitation and Corrections (ODRC), Derrick WILLIAMS was classified as a member of the Heartless Felons security threat group. The Heartless Felons are a well-known street gang that originated in detention/prison facilities, and operate on the streets of Cleveland. Heartless Felons are known for committing drug trafficking crimes and violent crimes, to include robberies.

13. SA Schwartz queried Brandon WILLIAMS' criminal history via NCIC and observed the following felony convictions and arrests:

**June 2007** – Domestic Violence (arrested)  
**May 2008** – Aggravated Murder (convicted of Voluntary Manslaughter)

14. SA Schwartz queried SWEENEY's criminal history via NCIC and observed the following felony convictions and arrests:

**July 2021** – Improperly Handling Firearms in a Motor Vehicle (convicted)  
**August 2022** – Receiving Stolen Property (arrested – currently wanted)

15. SA Schwartz queried HENLEY's criminal history via NCIC and observed that he has the following felony convictions and arrests:

**August 2015** – Carrying Concealed Weapon (convicted)

**August 2017** – Carrying Concealed Weapon (arrested)

**January 2018** – Attempted Receiving Stolen Property (convicted)

**Undercover Purchase of Narcotics from Antonio SWEENEY**

16. On June 26, 2023, ATF Special Agent Erik Kocinski, and ATF Task Force Officer Donald Kopchak, operating in an undercover capacity, along with CI-17813 and CI-11994, met with Antonio SWEENEY to conduct a controlled narcotics purchase. SA Kocinski, TFO Kopchak, CI-17813 and CI-11994 occupied an ATF Undercover Vehicle (UCV), which was equipped with hidden audio and video recording equipment. CI-17813 originally had communicated with Derrick WILLIAMS to arrange the purchase of cocaine. Prior to the undercover purchase, D. WILLIAMS advised he was with his children and was not available to conduct the sale. CI #17813 then contacted SWEENEY to purchase the cocaine. SWEENEY directed CI #17813 to 467 East 115<sup>th</sup>. The UCs arrived at 467 East 115<sup>th</sup> Street and observed SWEENEY exit the residence at 467 East 115<sup>th</sup> Street and approach the UCV. SWEENEY handed CI #17813 a clear plastic baggie containing the suspected cocaine. TFO Kopchak then took possession of the suspected cocaine and SA Kocinski handed SWEENEY \$360 in pre-recorded agent cashier funds. SWEENEY introduced himself to the UC's as "Antonio". SWEENEY then walked back to 467 East 115<sup>th</sup> Street and met with several unidentified individuals on the front porch. Subsequent lab results concluded that the substance was cocaine base, a Schedule II controlled substance.

**Undercover Meeting #1 with Derrick WILLIAMS and purchase of narcotics**

17. On July 26, 2023, ATF Special Agent Neddy Fierro, operating in an undercover capacity, and CI-17813, met with Derrick WILLIAMS to conduct a UC meet and a controlled narcotics purchase. SA Fierro and CI-17813 occupied an ATF Undercover Vehicle (UCV),

which was equipped with hidden audio and video recording equipment. SA Fierro and CI-17813 arrived at 462 E. 115 St., Cleveland, OH, and parked on the street. Shortly after, CI-17813 called D. WILLIAMS to inform D. WILLIAMS they had arrived. D. WILLIAMS arrived in a black Dodge Journey and parked across the street from the UCV. D. WILLIAMS then exited his vehicle, crossed the street, greeted the CI, and entered the backseat of the UCV.

18. Once D. WILLIAMS was in the UCV, CI-17813 informed D. WILLIAMS that “Tone” (Antonio SWEENEY) had asked CI-17813 to “put him on a lick” (SA Fierro interpreted this to mean SWEENEY wanted CI-17813 to provide information on a robbery). SA Fierro then informed D. WILLIAMS that their “big bro” (boss) transported large amounts of narcotics; specifically, cocaine for a Drug Trafficking Organization (DTO). D. WILLIAMS then asked SA Fierro if they knew the “ins and outs” (details of the organization). SA Fierro explained to D. WILLIAMS that his/her boss had seen “bricks” (kilograms of cocaine) in the residences the DTO used to store their product. SA Fierro further explained that the DTO constantly changed the locations where the cocaine was stored. SA Fierro informed D. WILLIAMS that his/her boss would pick up the cocaine at a different location each time. SA Fierro told D. WILLIAMS that CI-17813 had told them that D. WILLIAMS was “valid” (trustworthy). D. WILLIAMS appeared to show interest and told SA Fierro they could “split 50/50” (SA Fierro interpreted this to mean D. WILLIAMS was willing to take half of the cocaine from the residence as payment for participating in the robbery). D. WILLIAMS further stated “we gotta know what’s in there...what is what...do homework where everyone can be careful and come out this bitch good.” SA Fierro further explained to D. WILLIAMS that members and/or associates of the DTO were Hispanic. D. WILLIAMS then stated, “so ya’ll know all the ins and outs...the best thing ya’ll do is ya’ll tell us how to hit this shit” (SA Fierro interpreted this to mean D.

WILLIAMS wanted SA Fierro to instruct D. WILLIAMS and his boss on how to commit the robbery of the DTO in order to obtain the cocaine).

19. SA Fierro asked D. WILLIAMS if he had a “crew” to which D. WILLIAMS answered affirmatively “I got a crew.” D. WILLIAMS then asked SA Fierro, “What type of crew...three, two, or just me?” SA Fierro told D. WILLIAMS it would depend on how many individuals were in the residence. SA Fierro did not know how many individuals would be in the residence. D. WILLIAMS then stated, “What you think if we hit ’em...what we gonna get out of this...if I know what we gonna hit, I know how I gotta come...if a motherfucker to a point like it’s a lot...I know they got a lot of security.”

20. SA Fierro asked D. WILLIAMS to speak to his boss to see whether he/they were interested in the robbery. D. WILLIAMS then nodded affirmatively and stated, “We just gotta put our homework in.” SA Fierro explained that his/her boss was currently out of town but when the boss returned, the narcotics would be in Cleveland for pick-up. SA Fierro again explained to D. WILLIAMS that he/she did not know the details until the boss returned. SA Fierro explained to D. WILLIAMS that his/her boss had asked them (UCA and CI) to “find some dudes interested.” D. WILLIAMS then stated, “I’m going 50/50 with ya’ll...this on the strip...I’m 100 though bro I ain’t no greedy motherfucker...if it’s a brick we all bustin this bitch down...if it’s 10 bricks guess what, we all splittin’ this shit...that’s what I’m on...ya’ll just come to me cause at the end of the day we all on the same shit.” D. WILLIAMS further stated, “This a onetime deal and we get the fuck up outta here.”

21. SA Fierro explained to D. WILLIAMS that his/her boss asked SA Fierro to “find a crew that might be interested and can get down.” SA Fierro told D. WILLIAMS they would have to meet the boss for all of the final details. D. WILLIAMS then stated, “you, me, him,...we

the only ones that gotta link up...my peoples don't even have to link up because I'll break it down to them." SA Fierro told D. WILLIAMS that he/she would facilitate a meeting between D. WILLIAMS and his/her boss. D. WILLIAMS then stated, "if it's work (narcotics) I'ma move that bitch." D. WILLIAMS further stated, "I ain't even gonna tell them you told me...I got a lick...I gotta find out how this shit go then I'll run it down to them." D. WILLIAMS asked how SA Fierro's boss would receive the details regarding the narcotics and where they were stored. SA Fierro explained to D. WILLIAMS that the boss would be contacted with the location a couple hours before they were supposed pick up the cocaine. D. WILLIAMS replied, "No rush no nothin...take our time and put that shit together." D. WILLIAMS further stated, "I'ma ask him how much we get...It's a go for me," when he meets with SA Fierro's boss.

22. CI-17813 then asked D. WILLIAMS if they could purchase seven grams of "powder" (cocaine). D. WILLIAMS stated the CI could. D. WILLIAMS then placed a phone call to "Tay" in the presence of SA Fierro and CI-17813. D. WILLIAMS asked "Tay," "you got seven for me?" then hung up the phone. D. WILLIAMS informed SA Fierro that someone would bring the cocaine for CI-17813 to purchase. D. WILLIAMS stated he had previously been incarcerated for nine years for manslaughter. D. WILLIAMS asked CI-17813 if he/she would take "hard" (crack cocaine) instead of powder cocaine to which CI-17813 agreed. D. WILLIAMS then placed another phone call to "Tay" and instructed them to get the "hard" instead of the "powder."

23. As SA Fierro, CI, and D. WILLIAMS waited for the delivery of the crack cocaine, D. WILLIAMS pointed down the street and stated, "They hit this hood strong." D. WILLIAMS then told SA Fierro to watch "The Game Ain't for Everybody" movie on YouTube. D. WILLIAMS stated, "Mase" (Maceo MOORE, who was discussed above) starred in the film

and was an associate of D. WILLIAMS. D. WILLIAMS further stated that the film crew involved were actually federal agents. SA Fierro asked D. WILLIAMS what happened to “Mase” and his associates in the film. CI-17813 pulled up the film on YouTube and D. WILLIAMS confirmed it was the film he referred to. D. WILLIAMS identified “Mase” in the film. D. WILLIAMS stated, “Mase” would rob individuals or sell narcotics to individuals and then rob them afterwards. D. WILLIAMS then told SA Fierro that there were about thirty individuals arrested and stated, “Niggas that snitched...they dead.”

24. (“The Game Ain’t for Everybody” is a trailer for a movie, posted on YouTube.<sup>1</sup> According to a 2014 news article from Cleveland.com/The Plain Dealer, Maceo MOORE is featured in the video.<sup>2</sup> According to that article, MOORE pled guilty to Conspiracy to Distribute and Possess with Intent to Distribute Heroin in 2014, and was sentenced to 17 ½ years in prison by U.S. District Judge Christopher A. Boyko. The article reported that FBI agents had posed as documentary filmmakers, and MOORE “boasted to the agents of how he had made a career out of robbing other drug dealers, reselling their drugs and pocketing their money and jewelry.”).

25. CI-17813 and D. WILLIAMS exited the UCV. D. WILLIAMS stated that his associate was nearby to deliver the crack cocaine. A black pickup truck parked across the street from the UCV in front of 467 E. 115<sup>th</sup> Street, Cleveland, OH (residence believed to be D. WILLIAMS). SA Fierro observed an elderly black male exit the truck. D. WILLIAMS walked toward the unknown male and greeted him. D. WILLIAMS and the unknown male then entered the residence located at 467 E. 115<sup>th</sup> Street. Shortly after, D. WILLIAMS returned to the UCV

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<sup>1</sup> <https://www.youtube.com/watch?v=gKa6thsqxPs>

<sup>2</sup> [https://www.cleveland.com/court-justice/2014/08/aspiring\\_film\\_makerdrug-dealin.html](https://www.cleveland.com/court-justice/2014/08/aspiring_film_makerdrug-dealin.html)

and sold SA Fierro and CI crack cocaine. Subsequent lab results concluded that the substance was cocaine base, a Schedule II controlled substance.

### **Undercover Meeting #2 with Derrick WILLIAMS**

26. On August 1, 2023, at approximately 2:32 PM, SA Michael Ramos and SA Neddy Fierro, while working in an undercover capacity, activated the electronic surveillance recording equipment, and traveled to the vicinity of East 115<sup>th</sup> Street and Sellers Avenue, Cleveland, Ohio. At approximately 2:39 PM, SAs Ramos and Fierro arrived at the meeting location, occupying an ATF undercover vehicle (UCV) driven by SA Fierro. At approximately 2:42 PM, SA Fierro received an incoming phone call from D. WILLIAMS, who stated he was 3 minutes away from the meeting location.

27. At approximately 2:29 PM, D. WILLIAMS arrived at the meet location as the driver of a black Chevrolet Malibu bearing Ohio license plate JIQ7177. D. WILLIAMS exited the vehicle and entered the UCV from the rear passenger door.

28. SA Ramos then began to converse with D. WILLIAMS and explained that he was a disgruntled cocaine courier, who works for a Mexican based DTO. SA Ramos explained that the DTO had not provided payment to SA Ramos for the last two (2) times that SA Ramos had transported the kilograms of cocaine, and that was the reason SA Ramos was looking for someone to rob the stash house. SA Ramos proceeded to explain that the DTO utilizes different houses to stash the cocaine and furthermore, that SA Ramos never knows the pickup location until he receives a phone call, approximately one hour before it is time for him to make the pickup. SA Ramos informed D. WILLIAMS that the DTO was in debt to SA Ramos for “6 bands,” which is street vernacular for six thousand dollars. SA Ramos stated that the DTO maintained stash houses containing “pure cocaine”. SA Ramos then explained that he was

responsible for transporting two (2) to three (3) kilograms of cocaine for the DTO monthly. D. WILLIAMS stated, "Something happen, you don't think that's gonna come back on you?" SA Ramos stressed the importance that it could not appear as if SA Ramos played a role in the robbery.

29. SA Ramos then explained that every time, while collecting the cocaine at the stash houses, he observed at least an additional eight-ten (8-10) "keys" (kilograms) of cocaine. D. WILLIAMS stated, "Right, right, right. Probably more than that in there". SA Ramos explained that he has never been to the back of the residence and could only attest to the amounts of cocaine that SA Ramos has observed in the past. SA Ramos stated that every time he entered the stash house, there was always the same two guards at the residence, both of whom were always armed with firearms. SA Ramos explained that one guard answers the door armed with a handgun in his waistband while the other guard is seated at a table with additional kilograms of cocaine and a "Draco" ( a type of firearm that looks similar to an AK-47). SA Ramos then explained that when he entered the stash house, he would be provided 2-3 kilograms of cocaine, and then provided the destination location. D. WILLIAMS replied, "I don't want no shit coming back on you". SA Ramos again stressed the seriousness of the situation, and stated, "I'm dead. These some chop your head off type mother fuckers. I need professionals, not kid shit and they ain't gonna just lay down". D. WILLIAMS replied, "They smart. So, when they tell you the address..." SA Ramos explained that he was provided with the address on the day of the pickup and had approximately one hour to be at that location. SA Ramos further explained that if he did not arrive on time, the armed guards would pack up and depart the stash location with the cocaine. SA Ramos explained that it was imperative that D. WILLIAMS and his associates be together with SA Ramos, the day that the robbery was to be conducted, by reminding him, that

he never knows the pickup location until he receives a phone call a short time before it is time for SA Ramos to make the pickup.

30. SA Ramos afforded an opportunity for D. WILLIAMS to not partake in the robbery. D. WILLIAMS replied, "This the move to get out this shit". SA Ramos asked, "Do you do this shit," referring to robberies. D. WILLIAMS replied affirmatively. SA Ramos further stated that his next pickup would most likely be toward the end of August. SA Ramos then explained that he just wanted to make sure that D. WILLIAMS could handle this type of job because "this my life". D. WILLIAMS asked how SA Ramos met the members of the DTO, to which SA Ramos replied that he "married into" the situation. SA Ramos explained the possibility of "violence" to occur during the robbery. D. WILLIAMS replied, "Kill them niggas, have to get killed". SA Ramos explained that he did not have any "love" for the armed guards and advised that he was okay with D. WILLIAMS doing what he needed to do to SA Ramos, within reason.

31. SA Ramos advised D. WILLIAMS that he needed to meet his crew members so that everyone was on the "same page". D. WILLIAMS agreed, and stated, "I'm gonna bring you my people. I'm a show you, only gonna be like 3 people. I want you to know my peoples, this some professional shit". SA Ramos informed D. WILLIAMS that he would not proceed with the planning and execution of the robbery unless SA Ramos was comfortable. D. WILLIAMS replied, "They (armed guards) always ain't safe though, bro. Everybody get hit, anybody gets hit these days. They don't know if people been watching them". SA Ramos explained that the armed guards never utilize the same location as a stash house, and previous pickup locations have been on the east side and west side of Cleveland. SA Ramos assured D. WILLIAMS that the armed guards were not "sloppy" and asked D. WILLIAMS' plan for the execution of the

robbery. D. WILLIAMS replied, "I'm thinking hit both of them mother fuckers, we just ain't gonna rob you. We gotta get them too in the house. We might let you complete your mission, wait them out". SA Ramos explained that he was responsible for the "2 or 3 keys" if he departs the stash location with the cocaine. D. WILLIAMS stated, "You can go make your drop. At the end of the day, they have to come out unless they got more people that pickup more shit". SA Ramos advised that there were additional pickups after SA Ramos departed the stash location so time was of the essence. D. WILLIAMS replied, "You want all that shit in that house, you want the house," to which SA Ramos agreed. SA Ramos explained that he was "getting the fuck out of town" after the robbery. D. WILLIAMS added, "This what we gonna do, boss. Straight up cause I got to back myself out like too. I'm gonna send the mother fuckers in that bitch. Know what I'm sayin'? You said they in there with guns," to which SA Ramos replied, "Yeah, that shit is protected bro," and asked if D. WILLIAMS planned to commit the robbery while SA Ramos was inside the stash house. D. WILLIAMS replied, "It coming to that point, mother fucker got to kick a door in and they gonna be on there shit already so it's gonna be a shootout. You see what I'm sayin'? So, I'm trying to see the quietest way how to do that shit". SA Ramos reiterated that the robbery would not be an "easy, quick lick". In this context, a "lick" is a street vernacular term commonly used to refer to a robbery. D. WILLIAMS replied, "It gonna be like that shit mother fucker gonna send them in. It's gonna be laid out, get the shit and go...mother fucker come in behind closed doors don't notice it but if I know what's going on, I'm a do what I gotta do. Take that shit and get the fuck on".

32. SA Ramos asked if D. WILLIAMS had "people that do this shit". D. WILLIAMS replied affirmatively and stated, "I want you to see, you can see 'em too. ...I got niggas bro. I got people, some crash test dummies that I can just send. This one of them

missions. They going in straight killing, like shooting, get that shit. That's what they on". SA Ramos stressed the importance of having "professionals" handle the proposed situation. D. WILLIAMS replied, "I got you, I got you bro. You got us. We gonna put this shit to the best, to the best bro. I know how to do this shit. Like I say, if it gotta go that one way, we gonna do it that one way cause we gonna get everything out that bitch".

33. SA Ramos then asked the opinion of D. WILLIAMS on a split of the proceeds (kilograms of cocaine) from the robbery. D. WILLIAMS replied, "50/50 bro. Y'all come to me with this lick. Without y'all, I ain't shit," to which SA Ramos replied, "Without you, we ain't shit". D. WILLIAMS stated, "We gonna eat together bro. Straight like that man, ain't no mother fucking 60/40....I'm about to put this shit together though".

34. SA Ramos and D. WILLIAMS agreed to meet soon to further discuss details of the robbery. At approximately 3:05 PM, D. WILLIAMS exited the UCV. SAs Ramos and Fierro departed the area and deactivated the audio and video electronic surveillance recording equipment.

35. On this same date, at approximately 3:17 PM, SA Fierro received an incoming phone call from D. WILLIAMS. SA Fierro handed the phone to SA Ramos. D. WILLIAMS asked if the armed guards were still in the Cleveland area. SA Ramos replied that they "bounce in and out" of Cleveland and were attempting to set up a narcotics hub in the area. D. WILLIAMS asked if SA Ramos had the address of the last pickup because he believed the DTO may be utilizing Airbnb residences to store the cocaine. SA Ramos reiterated that the DTO utilized a different stash location for each pickup, and the residences were in neighborhoods, and sometimes in the middle of a street. D. WILLIAMS stated, "I need to look to get an understanding". SA Ramos explained that D. WILLIAMS "can't do homework, don't get

address until that day”. D. WILLIAMS stated that he would bring “my man” to the next meeting with SA Ramos and added that he already discussed the impending robbery with the associate.

D. WILLIAMS described his associate as a “professional”.

**Undercover meeting #3 with Derrick WILLIAMS and Markus WILLIAMS**

36. On August 9, 2023, at approximately 10:55AM, while travelling to the vicinity of the East 72<sup>nd</sup> Marina, Cleveland, Ohio, SA Fierro activated the electronic surveillance recording equipment. At approximately 10:58AM, SA Fierro arrived at the meet location, occupying an ATF undercover vehicle (UCV). At approximately 11:12AM, SA Fierro texted D. WILLIAMS to inform him of SA Fierro’s arrival at the predetermined meet location. D. WILLIAMS responded affirmatively. Then, SA Fierro sent an additional text inquiring about D. WILLIAMS’ estimated time of arrival (ETA). Shortly after, SA Fierro received a phone call from D. WILLIAMS, who informed SA Fierro that he was ten (10) minutes away from the meet location. This phone call was recorded.

37. On this same date, at approximately 11:25AM, D. WILLIAMS arrived at the meet location as the driver of a black Chevrolet Malibu, bearing Ohio license plate JIQ7177; M. WILLIAMS was the passenger of the previously described vehicle. D. WILLIAMS and M. WILLIAMS exited their vehicle and approached the UCV. Then, D. WILLIAMS entered the UCV from the rear passenger door and M. WILLIAMS entered the UCV from the front passenger door.

38. Once they were in the UCV, SA Fierro greeted D. WILLIAMS, who introduced M. WILLIAMS as his little brother, and stated that he was “one of the little niggas that’s gonna put it down...so he’s gonna make sure the whole plan right.” Then, SA Fierro asked M. WILLIAMS what D. WILLIAMS had told him about what SA Fierro and SA Ramos “had going

on.” M. WILLIAMS stated, “basically so far...you fuckin with somebody and shit... you trying to put a move (robbery) down ya feel me...but you want it going the right way cause ya’ll don’t want that shit to come back on you.” SA Fierro responded “exactly” and informed M.

WILLIAMS that SA Fierro and SA Ramos were looking for the right people they could trust. Then, SA Fierro asked M. WILLIAMS if D. WILLIAMS had told him what the split of the proceeds (kilograms of cocaine) were going to be. M. WILLIAMS stated that D. WILLIAMS had not told him.

39. Then, SA Fierro asked D. WILLIAMS and M. WILLIAMS, “do you think it’s going to be just you two or what’s the crew look like.” D. WILLIAMS stated, “no it’s going to be four (4) of us.” D. WILLIAMS further stated, “this is what I’m thinking...it’s best to hit both (SA Ramos and individuals guarding the stash house)...cause if you hit both of them bro it’s like they been being watched ya know what I’m sayin...instead of him (SA Ramos) in the house and he don’t get hit...now they (DTO) gonna know he set us up.” Then, D. WILLIAMS stated, “we gon let him (SA Ramos) in (stash house)...and now he be like damn I got hit too...what the fucking going on someone hit me right here...that robbed me.” M. WILLIAMS then stated, “this the only solution they (DTO) gonna come to...that someone been watching the spot and we gotta find out who it is...but ya’ll ain’t gonna find out.” Then, SA Fierro asked M. WILLIAMS if D. WILLIAMS had informed him that “they (individuals guarding the stash house) stay strapped (are always armed)”; to which M. WILLIAMS responded “yeah.” SA Fierro further explained that each time SA Ramos would pick up, it was the same two individuals at the residence. SA Fierro further stated that each individual “got it on ’em” (each individual is armed) and the only other firearm SA Ramos has seen was a “Draco.”

40. D. WILLIAMS asked SA Fierro if the individuals guarding the house ever left. SA Fierro explained to both WILLIAMS' that SA Ramos would receive a call an hour before he was supposed to pick up. SA Fierro further explained that the call was to notify SA Ramos of what area of the city they were supposed to go to and wait for additional call for information related to the location of the residence. SA Fierro informed D. WILLIAMS and M. WILLIAMS that once SA Ramos received the call with the location, SA Ramos would only have twenty (20) minutes to get to the residence. SA Fierro further explained that if SA Ramos was not there within 20 minutes, the armed guards would pack up and depart the residence with the cocaine. Then, SA Fierro told D. WILLIAMS and M. WILLIAMS that on the day of the robbery, "they" (SAs Fierro and Ramos, D. WILLIAMS, M. WILLIAMS, and their associates) must be together when SA Ramos receives the call related to the location, because they only have 20 minutes. D. WILLIAMS stated, "we gonna be there staking shit out." SA Fierro explained to D. WILLIAMS that SA Ramos would still have to enter the residence to pick up the cocaine; or it would look suspicious if SA Ramos picked up and then D. WILLIAMS, M. WILLIAMS, and their associates committed the robbery immediately after. SA Fierro further explained that it was imperative that it didn't appear as if SA Ramos had any involvement in the robbery. SA Fierro informed D. WILLIAMS and M. WILLIAMS, "they're (kilograms of cocaine) coming straight from the tap...straight from Colombia, they (DTO) ain't fucking around when it's 100% pure (cocaine)" D. WILLIAMS stated, "basically he gotta get hit in the house too."

41. SA Fierro told D. WILLIAMS and M. WILLIAMS, "you guys tell me how it works." SA Fierro explained that the location of the residences change each time but they are always similar. SA Fierro further explained that the residences are usually one or two bedroom homes. SA Fierro again explained that SA Ramos only picks up "2-3" (kilos of cocaine) at a time

but has seen additional kilos inside the residence. D. WILLIAMS stated “so they already have the money then.” SA Fierro explained that SA Ramos hadn’t seen money at the residence and only picks up the “product” (cocaine), then delivers it where they (DTO) instruct him to. Then, SA Fierro told WILLIAMS’ that SA Ramos “ain’t been paid...that’s his whole reason...it can’t come back on him.” SA Fierro then asked D. WILLIAMS “that’s what he told us right” to which D. WILLIAMS responded affirmatively “right.” SA Fierro informed them that SA Fierro had met members of the DTO but has never picked up for them. SA Fierro again informed M. WILLIAMS that SA Ramos only picks up “2-3” but has seen “8-10” when picking up. D. WILLIAMS stated “they (guards) could come out the house or a motherfucker getting them out the house...we gonna get them out the house...if we gotta shoot some just to get them run out...I’ll throw a bomb in there.” SA Fierro stressed to D. WILLIAMS “you can’t shoot my guy.”

42. D. WILLIAMS then explained to SA Fierro “he (SA Ramos) won’t even make it around the corner...if they (armed guards) getting hit then he gettin hit.” Then, M. WILLIAMS stated, “what if we do it like this...he (SA Ramos) go in and as he go in, he get what he goin to get...we hit his ass...we hit him right there in the front yard...we get the bag and try and make our way in the front door.” D. WILLIAMS stated “that’s only three (kilograms)...I’m all in.” M. WILLIAMS responded, “I’m trying to get everything in the house...I fucks wit my mans tough...I give a fuck about my peoples...we gonna go full fledge bro but if it too much we gotta back off and get up out of there.” M. WILLIAMS further stated, “if it’s a full go we in that bitch bro...my dudes trained and know how to move...they got my back just like I got yo back.” D. WILLIAMS then stated, “at the end of the day we gonna get ’em out the house...that’s when we gonna do what we do.” D. WILLIAMS further stated “he (SA Ramos) gonna have to get hit.”

43. SA Fierro explained to WILLIAMS' that it was important for SAs and M. WILLIAMS and D. WILLIAMS' "crew" to meet so there was no confusion during the robbery and to ensure that SA Ramos wasn't mistaken for an armed guard and injured. D. WILLIAMS stated that they would "hit" SA Ramos (meaning that D. WILLIAMS would contact SA Ramos by phone) after they pick up the cocaine. M. WILLIAMS then explained to D. WILLIAMS "he (SA Ramos) ain't going to have it (cocaine) going in Dee...he only having it coming out." D. WILLIAMS responded by stating "he (SA Ramos) go up in the house...he get his...and as he come out he getting hit...and we gettin them (armed guards) up out of there...nigga if I gotta throw a bomb they gonna run out the house...guess what at the end of the day they got dope in there...they got shit and police comin...we gonna have 4-5 minutes before they hit that bitch...they (armed guards) comin out that bitch either way...even if a nigga got boom boom and grab that shit bro." Then, M. WILLIAMS stated, "no shit bro we'll just throw a mothafuckin onion (explosive, believed to be a grenade) inside the window...make a big ass BOOM...that bitch big enough to scare a mothafucka...they know if police comin or not they don't know what the fuck goin on...they (armed guards) thinkin we gotta get the fuck up outta here, the police comin...pack up whatever...ya'll tryin pack up we gonna hit yo ass comin out." SA Fierro acknowledged and told D. WILLIAMS and M. WILLIAMS, "however ya'll wanna move and do it." Then, D. WILLIAMS told SA Fierro, "I don't want him (SA Ramos) in there in case it get ugly...I wanna make sure he cool...he gonna get hit comin out."

44. SA Fierro explained to D. WILLIAMS and M. WILLIAMS that this was "cartel shit" (cocaine distributed by a cartel in kilogram quantity) and that every kilogram was "stamped" (unique identifier pressed into kilograms of cocaine). SA Fierro told D. WILLIAMS and M. WILLIAMS that they had seen kilograms with various "stamps"; to include scorpions

and Bitcoin logos. Then, SA Fierro asked if they could “move that kind of weight” (sell/distribute kilogram quantities). D. WILLIAMS stated “shit bro we make that shit hard (crack cocaine)...we break it down and cook that shit.” (meaning that D. WILLIAMS and his associates cook the raw powder cocaine into crack cocaine). M. WILLIAMS acknowledged affirmatively “mmhmm.” Then, D. WILLIAMS stated, “I ain’t about to be out that bitch like I got a whole mothafuckin brick...that brings attention.” SA Fierro informed D. WILLIAMS and M. WILLIAMS, “If this (robbery) don’t go right, me and my mans (SA Ramos) are done (dead).”

45. Then, D. WILLIAMS asked SA Fierro again about receiving the stash house location sooner. M. WILLIAMS explained to D. WILLIAMS “his mans (SA Ramos) don’t know where the house at til 20 minutes...he go to the area and then the address...then he go to the address...then he pick it up and make a delivery.”

46. SA Fierro and D. WILLIAMS and M. WILLIAMS agreed to meet at a later date and SAs would meet their associates. D. WILLIAMS stated, “I might really sit and think of a way...we gonna get that bitch.” D. WILLIAMS further stated, “we about to come with a raw ass plan....I just wanna get in there and have the ups (firearm pointed) on a nigga.” Then, M. WILLIAMS stated, “two of my dudes that gonna come with us...one of them from down here (Cleveland) but the other one from out of town...that’s my hitter, hitter, he gets busy bro...I definitely ain’t gonna lie he definitely got a nice lil amount of artillery.” SA Fierro told WILLIAMS’ “ya’ll the pros bro...that’s why we comin to you”; to which they acknowledged affirmatively.

47. SA Fierro, D. WILLIAMS and M. WILLIAMS agreed to meet at a later date to further discuss details of the robbery with their associates. At approximately 11:45AM, D.

WILLIAMS and M. WILLIAMS exited the UCV. SA Fierro departed the area and deactivated the audio and video electronic surveillance recording equipment.

**Intelligence regarding Markus WILLIAMS**

48. SA Schwartz examined Markus WILLIAMS's criminal history and observed the following arrests and convictions:

**February 2009** – Felonious Assault (arrested)  
**February 2009** – Felony Criminal Stimulation (convicted)  
**March 2009** – Resisting Arrest, Felony Failure to Comply (convicted)  
**June 2009** – Possession of Drugs (arrested)  
**July 2010** – Aggravated Robbery (arrested)  
**March 2011** – Probation Violation (arrested)  
**March 2011** – Escape (convicted)  
**October 2012** – Probation Violation (arrested)  
**December 2012** – Receiving Stolen Property, Trafficking in Drugs (arrested)  
**March 2013** – Probation Violation (arrested)  
**September 2013** – Felony Theft (arrested)  
**September 2013** – Attempted RSP – MV (convicted)  
**September 2013** – Probation Violation (arrested)  
**February 2014** – Probation Violation (arrested)  
**February 2014** – Robbery (convicted)  
**March 2019** – Escape (arrested)  
**December 2019** – Carrying Concealed Weapon, Weapons Under Disability, Resisting Arrest, Obstructing Official Business, Defacing Marks of Firearm (convicted)  
**July 2022** – Probation Violation (arrested)

**Recorded phone calls with Derrick WILLIAMS**

49. On August 23, 2023, at approximately 12:53 PM, SA Fierro placed a call to D. WILLIAMS and told D. WILLIAMS “we kinda need to know what the word is” (If D. WILLIAMS was still wanting to conduct the robbery for cocaine). SA Fierro then informed D. WILLIAMS “it’s going to be Friday with or without you” (SA Ramos would be picking up the

cocaine on Friday with or without D. WILLIAMS' participation). SA Fierro then handed the phone to SA Ramos to converse with D. WILLIAMS.

50. SA Ramos greeted D. WILLIAMS who stated, "I'm coming in from out of town...I be there Thursday, we can chop it up real quick." D. WILLIAMS again stated that he was out of town. SA Ramos then informed D. WILLIAMS "I'm doing it with or without you guys". D. WILLIAMS replied, "I gotchu I'ma be there." Then, SA Ramos asked D. WILLIAMS "are your people ready to sit down and talk" to which D. WILLIAMS replied, "yeah everything's in motion bro...I got the people and everything." SA Ramos then asked D. WILLIAMS if he wanted SA Ramos to meet up with D. WILLIAMS' brother (Markus WILLIAMS). D. WILLIAMS stated, "matter of fact...I'm about to call him (Markus WILLIAMS) and ya'll meet down at the lake or something...he know everything that's going on." SA Ramos told D. WILLIAMS "I don't know how many you're talking about." D. WILLIAMS stated, "there's only three, there's only a couple." SA Ramos informed D. WILLIAMS that he'd like to speak with his brother and informed D. WILLIAMS that he didn't have a "time yet" (designated time to pick up the cocaine) but it would be on Friday. D. WILLIAMS stated, "It's a go, bro....it's going to be ready. We going to be ready, bro." D. WILLIAMS then stated that he would contact his brother and SAs may be able to meet him (Markus WILLIAMS) later that day. D. WILLIAMS further stated, "I'm about to call him and tell him everything...then let ya'll know what's going on." SA Ramos then asked if D. WILLIAMS would send his number or call SAs back. D. WILLIAMS stated he would call SAs back to discuss everything. SA Ramos stated he needed to speak with D. WILLIAMS to feel more comfortable about the situation. D. WILLIAMS stated "it's good bro, we good bro" then D. WILLIAMS ended the call.

51. On August 23, 2023, at approximately 10:41PM, SA Fierro received a phone call from Derrick WILLIAMS. D. WILLIAMS stated, “they gon’ meet ya’ll tomorrow...tomorrow morning. Same spot down there.” SA Fierro asked D. WILLIAMS what time they wanted to meet; to which D. WILLIAMS responded, “10 or 11” (10:00AM or 11:00AM). SA Fierro then asked D. WILLIAMS if he would be providing “him” (Markus WILLIAMS) SA Fierro’s telephone number. D. WILLIAMS informed SA Fierro that he would call SA Fierro to coordinate the meeting (w/ Markus WILLIAMS). Then, D. WILLIAMS stated, “I’m a call you first and let you know he (Markus WILLIAMS) is down there.” D. WILLIAMS further stated, “he (Markus WILLIAMS) got everything fosho fosho...he gon’ tell you about it...about the move (robbery) it’s sweet though...he came across something though.” SA Fierro informed D. WILLIAMS that SAs wanted to meet so that everyone was on the same page. Then, D. WILLIAMS stated, “that’s why he (Markus WILLIAMS) about to tell you everything...everything good bro...when ya’ll have ya’ll sit down though you’ll understand better...I don’t want to talk too much on this phone like that.” D. WILLIAMS further stated, “he (Markus WILLIAMS) gon’ explain everything...I should be back though I’m tryin’ aim for like Friday morning...I’m only a day away...I might be there I’m pushing it.” Then, D. WILLIAMS told SA Fierro, “at the end of the day it’s a go bro.” SA Fierro asked D. WILLIAMS what time he would be contacting SA Fierro to coordinate the meeting. D. WILLIAMS stated that he was near Kansas and there was a two-hour time difference, but SA Fierro should expect a call from D. WILLIAMS by 11:00AM the following day (August 24, 2023). Then, D. WILLIAMS stated “ya’ll gon meet down there and he gon’ tell you everything.” D. WILLIAMS then instructed SA Fierro to “bring homeboy (SA Ramos)...cause I want him to understand too you know what I’m

sayin' , we all got to understand it...I'm a be on the phone right there too though. I'm a be right in the conversation." (D. WILLIAMS will be present for the meet via telephone).

52. On August 24, 2023, at approximately 10:13AM, SA Fierro received a phone call from Derrick WILLIAMS. D. WILLIAMS stated "I just talked to him (Markus WILLIAMS) he gon' meet ya'll...he doing something right now but like in like a few hours...I'm about to give him your number for ya'll can talk...ya'll gon talk then I'ma call you and see what time he said then we all get together." SA Fierro informed D. WILLIAMS they were available as long as it was later that day. Then, D. WILLIAMS stated "yeah, we getting it done today...that's why I'm getting it together right now...I just talked to him...I'm about to give him your number so ya'll can talk."

#### **Undercover meeting #4 with Markus WILLIAMS**

53. On August 24, 2023, SA Michael Ramos, SA Neddy Fiero, and SA Mariela Lopez, acting in an undercover capacity, met with Markus WILLIAMS and Antonio SWEENEY. During the course of the undercover meeting, SA Ramos and SA Fierro were equipped with recording equipment. Prior to the undercover meeting, SA Fierro and M. WILLIAMS had cell phone text message communication and recorded phone calls for the purpose of arranging the undercover meeting. SA Fierro and M. WILLIAMS agreed to meet on August 24, 2023 at approximately 12:30 PM. M. WILLIAMS advised that he would be arriving in a "white Kia." At approximately 12:34 PM, SA Ramos, SA Fierro and SA Lopez activated the electronic surveillance recording equipment, while travelling to the East 72<sup>nd</sup> Street Marina, Cleveland, Ohio. At approximately 12:39 PM, SA Ramos, SA Fierro and SA Lopez were operating an ATF UCV and arrived at the meeting location. At approximately 1:02 PM, M. WILLIAMS and SWEENEY arrived in a white Kia Forte bearing OH license plate number

JVY8989. M. WILLIAMS was driving the vehicle. After parking the vehicle, M. WILLIAMS and SWEENEY exited the vehicle, SA Ramos and SA Fierro exited the UCV.

54. SA Ramos then began to converse with M. WILLIAMS and SWEENEY and stressed the importance of arriving on time. SA Ramos explained that he receives a phone call from the DTO approximately one hour before it is time for SA Ramos to make the pickup of cocaine, and a second call with the address of the pickup location. SA Ramos informed M. WILLIAMS and SWEENEY that he had to be at the pickup location within 20-25 minutes of receiving the address of the pickup location. SA Ramos further explained that if he did not arrive on time, the armed guards would pack up and depart the stash location with the cocaine. M. WILLIAMS stated, "For the house scenario we came up with, get some flash bombs and gas grenades." SA Ramos stated that he was only inside the pickup location for approximately 5 minutes and departs with "2 or 3 keys." M. WILLIAMS asked SWEENEY, "So you want to wait til he (SA Ramos) come out? Have somebody hit him and hit the house....shit don't come back on him (SA Ramos) at all," which SA Ramos understood to mean that it would appear as if SA Ramos did not participate in the execution of the robbery. SWEENEY asked if it was the "same people" in the pickup location. SA Ramos replied, "Same 2" and that the individuals were "strapped." In this context, "strapped" is a street vernacular term commonly used to refer to someone being armed with a firearm. M. WILLIAMS stated, "They ready. One handgun, one AK." SA Ramos then explained that every time, while collecting the cocaine at the stash houses, he observed at least an additional eight-ten (8-10) "kilos" of cocaine. SA Ramos described the product as "pure cocaine." M. WILLIAMS informed SA Ramos that "we got artillery too," while SWEENEY added, "Got the ARPs tonight," which SA Ramos understood to mean that M. WILLIAMS and SWEENEY had access to firearms to conduct the robbery. SWEENEY added,

“Depending if they have cameras or not, we can hit the windows with every single flash bang. Everything we got. Them don’t play, they (DTO) gonna be confused, can’t see shit. We run in there.” M. WILLIAMS added, “They ain’t got no cameras. It don’t be the same house. They always move houses.” SA Ramos explained that one guard answers the door armed with a handgun in his waistband. SWEENEY replied, “Throw everything in the room before you (SA Ramos) coming out. Coming out the door like soon as you open the door, we hittin’ the windows with every single one of ‘em. We got guns, there’s two of them. They don’t know what’s going on. They can’t see shit, they can’t hear shit. Put ‘em down, get some zip ties so we just can grab everything. There might be some money in there...scoop everything up out of there.” SA Ramos stated that he has never observed money inside of the pickup locations. SA Ramos informed M. WILLIAMS and SWEENEY that he has observed upwards of “12 bricks” of cocaine at the pickup locations and asked the opinion of M. WILLIAMS and SWEENEY on a split of the proceeds (kilograms of cocaine) from the robbery. M. WILLIAMS replied, “Split,” which SA Ramos understood to mean the proceeds would be a 50/50 split. SWEENEY suggested that all involved parties would gather later in the day to discuss “step by step, everybody know their part.” SA Ramos informed SWEENEY and M. WILLIAMS that the DTO was in debt to SA Ramos for “6 bands,” which is street vernacular for six thousand dollars.

55. SWEENEY brought up the topic of a “getaway car.” SA Ramos informed M. WILLIAMS and SWEENEY that he had access to a vehicle with a “trap” and was willing to allow them to utilize the vehicle to conduct the robbery. In this context, a “trap” is a street vernacular term commonly used to refer to a hidden compartment. SA Ramos informed M. WILLIAMS and SWEENEY that he would have the vehicle available at a storage unit as SA Ramos was departing the area immediately after the robbery was conducted. SA Ramos added

that his belongings, as well as his girlfriend's (SA Lopez) belongings, would be at the storage unit. SA Ramos suggested that the proceeds of the robbery could also be divided at the storage unit. SA Ramos informed M. WILLIAMS and SWEENEY that SA Fierro would be in the vicinity of the pickup location to ensure that "everything good." SWEENEY replied, "Got 2 more people I know for sure. With them two, it's gonna get done, everything. Every single last brick." M. WILLIAMS replied, "They need to go, feel me," to which SA Ramos replied, "Whatever the fuck happens in there, happens bro." SWEENEY replied, "We go in there, shit. Boom, boom. In and out after that." M. WILLIAMS and SWEENEY stated that a total of 5 individuals would participate in the execution of the robbery. SA Ramos asked for clarification if the robbery would be committed while SA Ramos was inside the pickup location. SWEENEY replied, "As you coming out, got the flash bangs and gas. It's over with after that." SA Ramos stressed the importance that it could not appear as if SA Ramos played a role in the robbery. M. WILLIAMS replied, "Remember that face (SA Ramos) that's going in, everyone else is fair game." SA Ramos explained that it was imperative that all involved parties were together before SA Ramos received the phone call from the DTO. M. WILLIAMS suggested that SA Ramos should be armed with a firearm stating, "Make sure you have something on you too though. Ain't no telling how they (DTO) might react. Make sure you have your joint on you too.....I want everyone to come out safe as possible."

56. SA Ramos again addressed the issue of the split of the proceeds (kilograms of cocaine). SA Ramos stated, "If 12 (kilograms of cocaine), you get 6 and we get 6?" M. WILLIAMS and SWEENEY both affirmatively acknowledged. SA Ramos asked, if needed, would M. WILLIAMS and SWEENEY be able to "move a key or 2 for us," which M. WILLIAMS and SWEENEY both affirmatively acknowledged. SA Ramos suggested that M.

WILLIAMS and SWEENEY “sit” on the kilograms of cocaine for a period of time as the DTO would “come looking” for the kilograms of cocaine. SA Ramos explained that the kilograms of cocaine were “stamped” with identifying markings. SWEENEY replied, “I’ll bury my shit,” while M. WILLIAMS added, “Whip my shit into crack.” SA Ramos described the cocaine as “pure Colombian cocaine” that was not diluted with any cutting agents so M. WILLIAMS and SWEENEY could “step on it 4-5 times.” SWEENEY replied, “That’s exactly what I’m doing.” M. WILLIAMS added, “Hit you (SA Ramos) when you coming out, hit them back windows. You already out the way. Gun shots fire off, we ain’t even aiming at you though. You start running, wherever he (SA Fierro) at, around the corner or something. Fire back as we firing. Get off your name,” which SA Ramos understood to mean that if SA Ramos discharged his firearm, then it would appear as if SA Ramos did not participate in the planning/execution of the robbery. SA Ramos stated that robbery would have to be executed quickly as the pickup locations were often located in neighborhoods. SWEENEY replied, “Me and him (M. WILLIAMS) the best get away drivers you’ll ever meet.” M. WILLIAMS stated to SWEENEY, “So we gone hit him (SA Ramos), go hit the house. Feel me? Once we throw that shit in there, they droppin’. I’m sorry. Mother fucker can’t shoot me choking.” SA Ramos asked if M. WILLIAMS and SWEENEY had masks to protect them from the fumes to which SWEENEY replied, “Going in that bitch with 2 ski masks.” M. WILLIAMS added, “Grab a lot of bricks myself. Everybody just grabbing shit. Whatever else. Their guns, everything. We getting anything in there.” SA Ramos suggested that SA Fierro obtain the phone number of SWEENEY. M. WILLIAMS agreed. SWEENEY provided a cellular phone number of 216-237-XXXX to SA Fierro.

57. SA Ramos asked SWEENEY if he was “with it,” meaning willing to participate in the robbery. SWEENEY replied affirmatively and stated, “Every single piece of dirt I did never went down. Never got caught. No co-defendants, no nothing.” SWEENEY boasted about an ATM robbery that he participated in a couple years ago that resulted in the acquisition of two hundred forty thousand dollars that he had to “split it four ways.” At approximately 1:21 PM, SAs Ramos and Fierro reentered the UCV. M. WILLIAMS and SWEENEY reentered the Kia Forte and departed. SAs Ramos, Fierro, and Lopez departed the area and deactivated the audio and video electronic surveillance recording equipment.

**Undercover meeting #5 with Antonio SWEENEY and Maurice COMMONS**

58. On August 24, 2023, SA Michael Ramos, and SA Neddy Fierro, acting in an undercover capacity, met with Antonio SWEENEY and Maurice COMMONS. During the course of the undercover meeting, SA Ramos and SA Fierro were equipped with recording equipment. Prior to the undercover meeting, SA Fierro was in telephonic communication and recorded phone calls for the purposes of arranging the undercover meeting. During the recorded phone call, SWEENEY stated that he wanted to meet with SA Ramos and SA Fierro to further discuss the robbery and introduce them to his associate who would be participating in the robbery. SA Ramos and SA Fierro agreed to meet with SWEENEY later that day. At approximately 4:29 PM, SA Ramos and SA Fierro activated the electronic surveillance recording equipment, while travelling to the vicinity of the East 72<sup>nd</sup> Street Marina in Cleveland, Ohio. At approximately 4:36 PM, SA Ramos and SA Fierro arrived at the meeting location, occupying an ATF UCV driven by SA Fierro. Upon arrival, SA Ramos and SA Fierro observed a white Chrysler 300 sedan, then observed SWEENEY and an individual later identified as Maurice

COMMONS (B/M, 01/26/2001, XXX-XX-5914), exit the vehicle, approach the UCV, then enter the backseat of the UCV.

59. Once in the UCV, SWEENEY greeted SA Ramos and SA Fierro and COMMONS introduced himself as "Money." Then, SA Ramos asked SWEENEY, "what you tell money bro." SWEENEY told SAs "me and him trying to put together a plan because I want to get less people...even if we could cut out who my uncle (Markus WILLIAMS) got comin...it would be me, uncle, and money." Then, SWEENEY stated, "we was thinking because we do the whole get everything...we have a lot of planning before, after, and during...that's a lot of shit." Then, COMMONS stated, "on some quick money...we can get whatever you (SA Ramos) grab (kilograms of cocaine) that's with lesser people." Then, SWEENEY stated, "the way how we do it is...we all at the same spot beforehand right...as soon as you (SA Ramos) get the call...boom, we B line it over there (DTO) stash house) we packin down the street...we watch you (SA Ramos) pull up...we'll watch you come out the house with the shit (kilograms of cocaine)...we punch it in our car while you head down the street...we can swerve in front of your car...hop out with the guns...I can hit you with that shit...I ain't gonna hit you hard...grab that shit (kilograms of cocaine) and niggas can meet up at the spot."

60. SA Ramos then asked COMMONS, "you ain't trying to get that shit (kilograms of cocaine) in the crib." SA Ramos further explained to COMMONS, "I'm on the hook for that shit." Then, COMMONS stated, "we want them niggas gone (dead)." SA Ramos told COMMONS, "I ain't got no love for these motherfuckers (DTO armed guards)." Then, COMMONS asked, "what they got (firearms) in there?" SA Ramos told COMMONS, "they got a pistol and a draco...these motherfuckers ain't not punks...I'm just telling you what you in for." SA Ramos then explained that he was responsible for transporting two (2) to three (3) kilograms

of cocaine and would see the same two armed individuals each time with firearms in their waistband. Then, COMMONS stated, “that’s the first thing he fucked up with...having that bitch in his waist...if there’s only two of them we can clean (kill) that nigga right there in front of you if you don’t mind seeing that shit...I’ll smoke that nigga right there and we moving in that bitch and kill the other nigga.” SA Ramos informed COMMONS that the DTO was in debt to SA Ramos for “6 bands,” which is street vernacular for six thousand dollars. SA Ramos then informed COMMONS they had “no love for these dudes... whatever happens in that bitch happens... it just can’t look like I had anything to do with it... you gotta do what you gotta do... you tell me how you want me to do it.” Then, COMMONS asked SA Ramos, “where do the other dude be at?”; to which SA Ramos informed COMMONS that he’s usually in the living room. SA Ramos further explained that the location of the stash houses change each time and they don’t get the address with more than a 20-minute notice. Then, SA Ramos informed COMMONS, “I got 20 minutes to get to that bitch or they’re gone... that’s why we all have to be together... when I get the call we gotta go... tell me how you guys want to fucking do it... I’m trying to get the whole fucking load (all available kilograms of cocaine)... I ain’t trying to do 2 or 3 I can do that myself.” Then, COMMONS stated, “they gonna see us coming regardless...so my best bet is while you in that bitch we just gonna kick the door...instantly hit the ground because I’m shootin...them niggas is gone (dead) and we go to meet up spot break all that shit down.”

61. SA Ramos informed COMMONS that if they weren’t comfortable with the plan they wouldn’t do it and needed professionals. SA Ramos told COMMONS and SWEENEY that everyone needed to be “on point”, to which COMMONS replied, “let’s do this.” SA Fierro then told COMMONS, “this isn’t a trap house... this is pure cocaine... Colombia from the tap.”

COMMONS then asked SA Ramos, “what stamp (identifying marking pressed into kilograms of cocaine by DTOs) on that bitch.” SA Ramos explained that the “stamp” varied but they had seen a scorpion and even a bitcoin symbol on kilos. Then, SA Ramos told COMMONS if he “put them down” (kill armed guards) people (DTO) would be coming. Then, SA Ramos further described the cocaine as pure and uncut.

62. Then, SWEENEY asked when SAs would contact them the following day. SA Ramos informed both SWEENEY and COMMONS they didn’t know exactly when but contact them once they had more details. SA Ramos further explained that they usually get the stash house location in the afternoon. Then, COMMONS asked SA Ramos if the stash house had cameras or other surveillance. SA Ramos informed COMMONS that they hadn’t seen any cameras or money, just cocaine. SA Ramos then asked COMMONS if SWEENEY had explained the split to him, to which COMMONS replied “50/50.” SA Ramos then offered to provide SWEENEY and COMMONS a vehicle to utilize. Then, COMMONS stated “when we leave here we going to get the guns... that’s the only thing we need is the car.”

63. SA Ramos explained to SWEENEY and COMMONS that they didn’t want there to be any confusion while SA Ramos is in the residence for their safety. SA Ramos then asked COMMONS if he would provide SAs with his phone number (216-644-XXXX), which he provided to SA Fierro. Then, SA Ramos asked COMMONS if he was “with this shit” and COMMONS replied “hell yeah...this shit going down.” SA Ramos then asked COMMONS if he had any questions. COMMONS stated, “that’s it... it is what it is.” Then, COMMONS asked SA Ramos, “do you feel safer if you walking out that bitch and we come in... or do you want me to kick that door down?” SA Ramos told COMMONS that it didn’t matter as long as it didn’t appear as if SA Ramos was complicit. Then, SA Ramos told COMMONS, “if they getting put

down (killed) I guess it doesn't matter." Then, COMMONS stated, "I don't see no other way how it could be... I don't like shit to come back... that's why I'm sayin' the best bet is to put them niggas down." SA Ramos then told COMMONS, "they (armed guards) aren't just going to lay down... there could be a fire fight in that bitch." Then, SWEENEY stated, "when we come in we shooting." COMMONS then interjected and stated, "literally, that's what I'm telling you...they not even gonna look at what the fuck is going on." SA Ramos then asked SWEENEY and COMMONS if they were going to use "bangs" (flashbangs) through the windows. Then, COMMONS stated, "we gonna kick the door in and throw them in... they can go off while we go in... when we get them bitches we leaving with everything." SWEENEY then stated, "we about to get all this shit together." At approximately 4:50PM, SWEENEY and COMMONS exited the UCV. SAs Ramos and Fierro departed the area and deactivated the audio and video electronic surveillance recording equipment. After the operation, SA Schwartz queried the phone number COMMONS provided to the UC's, utilizing law enforcement resources, and saw that the phone number was associated to Maurice COMMONS. SA Schwartz showed an Ohio driver's license photo of Maurice COMMONS to the UC's, who both stated was the person they previously met, with Antonio SWEENEY.

#### **Intelligence regarding Maurice COMMONS**

64. SA Schwartz queries Maurice COMMONS' criminal history and observed the following arrests and convictions:

**September 2022** – Attempted Forgery, Attempted Aggravated Theft (convicted)

65. SA Schwartz reviewed Cleveland Police Department report number 23-000632 and learned that COMMONS was listed as a suspect in aggravated robbery which occurred on January 1, 2023. CPD Officers responded and made contact with the victim who stated that

Maurice COMMONS is her boyfriend, and stole her 2019 Chevrolet Malibu. The victim stated that she and COMMONS got home, and he told her he was leaving. The victim told COMMONS that he is not allowed to take her vehicle, then COMMONS pointed a firearm at her and started to drive away. The victim stated the firearm was a black, Glock 19. CPD Officers interviewed a witness, who corroborated the victim's statements. The victim also stated that COMMONS is known to carry his firearm on him at all times, and that the victim had a pink and black firearm which was also in the vehicle, when it was stolen.

**Pre-Meet at 5307 Woodland Avenue with M. WILLIAMS, SWEENEY, COMMONS, and unidentified male.**

66. On Friday, August 25, 2023, SA Ramos, and SA Fierro, acting in an undercover capacity, met with M. WILLIAMS, SWEENEY, COMMONS and a male, later identified as Alante HEARD (B/M, 05/12/1990, XXX-XX-1815) at the Sunoco gas station, located at 5307 Woodland Avenue. During the course of the undercover meeting, SA Ramos and SA Fierro were equipped with recording equipment. Prior to the undercover meeting, SA Fierro was in telephonic communication and recorded phone calls with SWEENEY and M. WILLIAMS for the purposes of arranging the undercover meeting. SWEENEY and M. WILLIAMS agreed to meet SA Ramos and SA Fierro at the Sunoco gas station, located at 5307 Woodland Avenue. At approximately 12:26 PM, SA Ramos and SA Fierro arrived at 5307 Woodland Avenue, occupying an ATF UCV driven by SA Fierro. At approximately 12:34 PM, SA Ramos and SA Fierro activated the electronic surveillance recording equipment on their person and in the UCV. At approximately 12:41 PM SA Ramos and SA Fierro observed the white Kia Forte, bearing OH license JVY8989, which was previously operated by M. WILLIAMS, arrive. M. WILLIAMS was driving the vehicle, SWEENEY was seated in the front right seat, COMMONS was seated

in the rear left seat, and HEARD was seated in the rear right seat. After parking the vehicle, M. WILLIAMS, SWEENEY, COMMONS, HEARD exited the vehicle. At the same time, SA Ramos and SA Fierro exited the UCV, and all parties greeted each other. HEARD introduced himself to SA Ramos and SA Fierro as "Tay."

67. After the introductions, M. WILLIAMS stated, "we got two more people too, they out loading shit up right now." SA Ramos asked, "how long before their arrival?" SWEENEY replied, "they around." M. WILLIAMS added, "they stay real close by." SA Ramos asked HEARD, "you with the business?" To which HEARD replied, "hell yea." SA Ramos asked, if all were good with the split? To which M. WILLIAMS replied, "yea, 50/50." SWEENEY added, "whatever cut I get, I got to pay out him (and points at COMMONS)." SA Ramos added, "if there's 12 kilos in the house bro, we get 6, y'all get 6." HEARD replied, "hell yea." SWEENEY asked SA Ramos about the "wheels" (vehicle that was to be supplied by SA Ramos and SA Fierro) and stated, "three of us in the whip, in the whip you give us." SA Ramos observed M. WILLIAMS motion SA Fierro to the rear of the Kia, and the trunk opened. M. WILLIAMS then motioned SA Fierro to come to the trunk of the Kia. SA Fierro observe an AK style rifle in the trunk of the Kia. SWEENEY stated, "grabbed that this morning" (which SA Ramos understood to mean the AK style rifle which was in the trunk of the Kia). SA Ramos suggested that the two unknown individuals meet with everyone at the storage unit, because that was where the vehicle was located, to which HEARD replied, "hell yea." SA Ramos asked who was "going into the crib" (referring to the purported drug stash house). COMMONS replied, in the presence of M. WILLIAMS and HEARD, "I am, but listen, the way how it's going to be, when you coming out (SA Ramos), the niggas in the front gon' do what they do with you, and then it's niggas already at that time, gone be in the back going inside the house. You not even

gone be in the house.” SA Ramos stated, “I want your guys (referring to the two unknown individuals) to see me.” HEARD nodded his head affirmatively. M. WILLIAMS then stated, in the presence of HEARD and COMMONS, “everyone come after you, it’s one of us right here (meaning M. WILLIAMS, HEARD, COMMONS or SWEENEY). Them other two, they coming through the back. They know of you, they know what’s going on, nigga coming out with the bag (SA Ramos, carrying a bag containing 2-3 kilograms of cocaine), do not touch him, that’s our man (referring to SA Ramos). They gone throw them mother fuckin flash bombs and shit in that bitch, feel me? And make their way through the back. That way, look, do what we do, and getting you, we get away with the bag (SA Ramos, carrying a bag containing 2-3 kilograms of cocaine). You (SA Ramos) make your way to him (SA Fierro) boom boom boom boom boom. You ain’t shooting at us, but you gonna let some shots off. We gone. We gone meet back up, and do our split.” SWEENEY stated, “he (referring to M. WILLIAMS) is paying Dee (referring to D. WILLIAMS). I got the niggas I got. This my team right here.” COMMONS added, “you gonna take 6 (kilograms of cocaine) we gonna do what we do with our 6 (kilograms of cocaine). SA Ramos asked HEARD, “know what you are doing?” HEARD nodded his head affirmatively, and stated “I ain’t new to this, I’m true to this. I’ve been doing this shit since I was 12 years old. This shit ain’t nothing.” COMMONS asked SA Ramos, while in the presence of HEARD, if he was “cool with getting hit with the gun and all that? You want to make it as real as possible? I ain’t gonna dislocate your jaw or nothing, give it a little tussle, you feel me? Make it so we can get the fuck up out of there.” HEARD added, “it’s definitely on the floor though, it’s on the floor.” SA Ramos asked HEARD, “you want me to get on the floor?” HEARD replied, “no it’s on the floor, we about to handle the situation.” COMMONS, while in the presence of SWEENEY and HEARD, stated, “when you coming out the house with the bag (SA Ramos,

carrying a bag containing 2-3 kilograms of cocaine), is when we pulling up with the car. We gone hop out, we gone tussle with you, do whatever the fuck we gotta do. Or, if you make it inside the car, we just pull up on the side of your car, you know open up your door, tussle with you, grab the bag, and we gone. During all of that time, there's gonna be niggas coming in from the back of the house." SA Ramos replied, "I want the whole house" and stressed the importance of it not as appearing as if SA Ramos had anything to do with the planning or execution of the robbery, to which HEARD replied, "right." SWEENEY stated that they were in possession of a "drac and two handguns." SWEENEY added, that he was going to be in possession of one of the firearms, because he was driving the car. SWEENEY stated, while in the presence of COMMONS and HEARD, "if they (the two unknown associates) ain't here in 5 minutes though, it's just gonna be us." HEARD replied, "shit we can head to the storage then, and meet them there...time is money." SA Ramos stated to HEARD, "I'm telling you bro, I told these dudes, man, imma get the call with the address, bro, if I'm not at the address in 20 minutes, bro, they pack up all their coke and they fucking leave." To which HEARD replied, "right." COMMONS stated, while in the presence of HEARD, "listen though, this so we on the same page again. We gone pull up and you walking out the house with the bag. Whether we make, let, you get to the car, or we just do it right there, while you walking out, but you not gonna be in the house, when we send our niggas through the back." SA Ramos stated to HEARD, "all I care about, bro, is that we get all the cocaine, out the house, and it don't look like I had something to do with this shit. Whatever happens in that house, happens. I told you, I don't have love for those mother fuckers." HEARD nodded his head affirmatively, and stated, "let's do it, let's get it done."

68. While SA Ramos was speaking with SWEENEY, SA Fierro asked M. WILLIAMS, “what’s up with the split...how’s Dee (Derrick WILLIAMS) on this?” M. WILLIAMS stated, “yea, Dee cool, I already talked to him earlier.” SA Fierro then stated, “I ain’t trying to over-step, since he brought me to you.” M. WILLIAMS stated, “because he trusts me, I’m his little brother, he already know I ain’t gonna play any games. He already know he gonna get his shit.” M. WILLIAMS then asked, “do we gotta park in the driveway, or can we park in the street (of the purported drug stash house).” SA Fierro explained that the UC’s did not know the address of the residence and weren’t certain if there was a driveway at the residence. M. WILLIAMS then stated, “there’s gonna be a move in the front, and a move in the back.” Which SA Fierro interpreted to mean that there would be assailants in the front of the residence and assailants in the rear of the residence. M. WILLIAMS further stated, “along as he (SA Ramos) is a little further away from the house (purported drug stash house), we can pull up, and jump out, and lay his ass down, ya feel me? We trying to be discrete too.” SA Fierro explained that the additional vehicle which was to be used in the robbery was at a nearby storage facility and that all parties would go to the storage facility after the meeting. SA Fierro explained that they would have to be ready and at the storage facility when SA Ramos received the phone call with the address of the purported drug stash house. M. WILLIAMS then stated, “as long as we sitting down the street, while he going in...and we see him coming out, we gonna do what we gonna do. I’ll be on the phone with my man, then go.” SA Fierro interpreted this to mean that M. WILLIAMS would be on the phone with the other assailants who would be at the rear of the residence. M. WILLIAMS stated, “that’s the best plan we came up with...he’s cool, he can go ahead (in reference to SA Ramos). M. WILLIAMS stated, “my niggas they anxious...they ready to go...I ain’t gonna lie.” M. WILLIAMS stated, “the reason I ain’t put them (SWEENEY /

COMMONS) on him (SA Ramos) is because they kinda hot-headed...we don't want no hot-heads...we need that shit going towards the house (purported drug stash house)...I really didn't want to bring them to the meet. I'd rather deal with them on my end...I told they ass...shit I'm gonna pay y'all in hard (crack-cocaine)...so they ain't getting no powder (cocaine)...they ain't about to see no stamps (distinct markings commonly pressed into kilos of cocaine by drug trafficking organizations)...I'm keeping them in the blind...only ones I trust, is who you see right here...this my team right here." M. WILLIAMS then stated, as long as we pulling up...put him down (SA Ramos), and hurry and get the bag...he gotta be gone before that boom go off (SA Ramos)...that boom ain't about to go off until we get that bag from him (SA Ramos)...we need like a little head start." SA Fierro explained that they wanted the whole bag (all kilograms of cocaine)...not just two or three. M. WILLIAMS then stated, "we about to try go get all them bitches...that's what I'm talking about...I'm sending my hot heads." M. WILLIAMS then entered into the back seat of the Kia, retrieved a cannister of "Takedown Oleoresin Capsicum" which he planned on using during the robbery and showed it to SA Fierro.

69. SA Ramos and SA Fierro advised M. WILLIAMS, SWEENEY, COMMONS, and HEARD to follow them to Buckeye State Storage, located at 2844 Broadway Avenue. M. WILLIAMS, SWEENEY, COMMONS, and HEARD all agreed, re-entered the white Kia Forte, bearing OH license JYV8989, at approximately 12:51 PM and began following SA Ramos and SA Fierro in the UCV. At approximately 12:57 PM, the UCV and the white Kia Forte, bearing OH license JYV8989 arrived at 2844 Broadway Avenue. SA Fierro parked the UCV, then SA Fierro and SA Ramos exited the UCV, and stood next to another ATF UCV which was also parked in the parking lot of the storage facility. M. WILLIAMS parked the white Kia Forte directly behind the first UCV, then M. WILLIAMS, SWEENEY, COMMONS, and HEARD

exited their vehicle. SA Ramos and SA Fierro observed that SWEENEY retrieved blue surgical gloves from his left sweatshirt pocket and handed the blue surgical gloves to each M.

WILLIAMS, COMMONS and HEARD. SWEENEY, M. WILLIAMS, and COMMONS put on the blue surgical gloves. HEARD placed the blue surgical gloves in his left front hoodie pocket. M. WILLIAMS, SWEENEY, COMMONS and HEARD then approached the rear of the second UCV. At approximately 12:59 PM, an arrest signal was given, and M. WILLIAMS, SWEENEY, COMMONS, and HEARD were taken into custody.

#### **Intelligence regarding Alante HEARD**

70. “Tay” stated that his name is Alante HEARD (B/M, 05/12/1990, XXX-XX-1815). An Ohio driver’s license photograph of HEARD was obtained and shown to SA Ramos and SA Fierro who positively identified him. SA Schwartz queried HEARD’s criminal history via the National Crime Information Center (NCIC) and observed the following convictions and arrests:

**July 2009** – Domestic Violence (convicted)  
**October 2009** – Possession of Drugs (arrested)  
**October 2009** – Violate Protection Order (convicted)  
**March 2010** – Possession of Drugs (convicted)  
**December 2010** – Possession of Drugs (convicted)  
**February 2011** – Possession of Drugs (arrested)  
**March 2011** – Possession of Drugs (arrested)  
**January 2012** – Domestic Violence (arrested)  
**October 2012** – Obstructing Official Business (convicted)

### Communication with D. WILLIAMS

71. After the arrest, SA Fierro called D. WILLIAMS, but he did not answer. D.

WILLIAMS then texted SA Fierro the following:

2023/08/25	01:23:29 PM EDT	216-414-4294	SMS	Incoming	What's good bro I can't really talk on the phone driving this big ass truck
2023/08/25	01:24:53 PM EDT	216-414-4294	SMS	Incoming	Y'all good bro
2023/08/25	01:25:40 PM EDT	216-414-4294	SMS	Outgoing	About to link with your bro and his guys. U still good with 50/50 split 6 bricks for us and 6 bricks for you
2023/08/25	01:27:49 PM EDT	216-414-4294	SMS	Incoming	That's cool bro I told you that from the jump in y'all be careful n have each other back bro
2023/08/25	01:28:30 PM EDT	216-414-4294	SMS	Outgoing	Ight bet say less

72. It should be noted that in the above screenshot, the “Incoming” messages are from D. WILLIAMS and the “Outgoing” messages are from SA Fierro.

### Interviews of M. WILLIAMS, SWEENEY, COMMONS and HEARD

73. After the arrest, M. WILLIAMS, SWEENEY, COMMONS and HEARD were transported to the ATF Cleveland Field Office, located at 5005 Rockside Road, Suite 700, Independence, OH, 44131. The interviews were audio and video recorded.

74. SA William Marino and SA Michael Wido read COMMONS his Miranda rights, which COMMONS stated he understood, agreed to speak with Agents, and signed the ATF Form 3200.4, Advice of Rights and Waiver. COMMONS admitted to purchasing and using cocaine throughout the past year. COMMONS admitted to purchasing cocaine from a Hispanic male on the west-side of Cleveland. When asked about the purported drug stash house robbery,

COMMONS stated that the plan was to make it look like a robbery of SA Ramos, for the cocaine that SA Ramos would obtain from the purported drug stash house, but not to actually enter the purported drug stash house. COMMONS stated that with his split (portion of the purported cocaine to be robbed), he planned to only use the cocaine.

75. SA Michael Wido read SWEENEY his Miranda rights, which SWEENEY stated he understood, agreed to speak with Agents, and signed the ATF Form 3200.4, Advice of Rights and Waiver. SWEENEY stated he obtained the AK 47 style rifle from his relative's house. SWEENEY stated he also obtained the blue surgical gloves a covid style masks to use in the robbery. SWEENEY stated he obtained the gloves because his fingerprints were in the system and didn't want to be connected to any crime. SWEENEY stated that his role in the purported drug stash house robbery, was to be the get-away driver of the Cadillac Escalade (UCV-2). SWEENEY stated that they weren't going to go into the purported drug stash house, they were going to let SA Ramos leave, and that SA Ramos would provide the cocaine at a later time. SWEENEY admitted to middling previous drug transactions, and that sometimes he would be armed during those transactions. SWEENEY stated that his uncles provided the cocaine that he middled.

76. SWEENEY acknowledged that he was a previously convicted felon and could not legally possess firearms. SWEENEY stated that his co-conspirators asked him to obtain firearms prior to the robbery. SWEENEY stated the plan was to meet the UCA at the location where multiple kilograms of cocaine was being stored, however SWEENEY and his co-conspirators did not know this location. SWEENEY stated the UCA advised him that ten to eleven kilograms of cocaine were stored in the residence, which was protected by armed Hispanic Cartel Members.

SWEENEY stated he was going to get paid for being the getaway driver and it was agreed upon by his co-conspirators.

77. SA Gerrod Briggs and TFO Donald Kopchak read M. WILLIAMS his Miranda rights, which M. WILLIAMS stated he understood, agreed to speak with Agents, and signed the ATF Form 3200.4, Advice of Rights and Waiver. M. WILLIAMS stated he was introduced to two (2) individuals (ATF UCs) approximately two or three weeks prior by his brother D. WILLIAMS. M. WILLIAMS stated he met with these individuals multiple times prior to August 25, 2023. M. WILLIAMS stated after meeting the ATF UCs they devised a plan to commit a robbery of kilograms of cocaine from a stash house. M. WILLIAMS stated he was told there could be anywhere from six (6) to twelve (12) kilograms of cocaine in the stash house and that it was protected by two (2) men armed with firearms. M. WILLIAMS stated he discussed splitting the cocaine taken from the robbery 50/50 with ATF UCs who he had previously met with.

78. M. WILLIAMS stated on August 25, 2023, he picked up HEARD near HEARD's residence in the Glenville neighborhood of Cleveland, Ohio. M. WILLIAMS stated he picked SWEENEY up at SWEENEY's sister's residence in the area of Euclid Creek Park. M. WILLIAMS then stated he picked up COMMONS but could not recall where. M. WILLIAMS stated he had discussed with the other members of his robbery crew that they would not make entry into the stash house. M. WILLIAMS stated they had devised a plan to have the ATF UC enter the stash house and retrieve kilograms of cocaine and then rob the ATF UC. M. WILLIAMS stated that after the robbery they would contact the ATF UC about splitting cocaine and/or getting paid for the cocaine. M. WILLIAMS stated after picking up all the other members of the planned robbery crew they went to the location provided to them by the ATF

UCs. M. WILLIAMS stated they then met with the ATF UCs at the gas station at E. 55th and Woodland Ave.

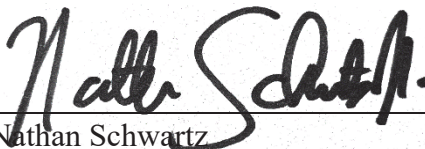
79. SA Gerrod Briggs and SA Eric Madry provided HEARD his Miranda rights, which HEARD stated he understood, agreed to speak with Agents, and signed the ATF Form 3200.4, Advice of Rights and Waiver. HEARD stated that he knew M. WILLIAMS and SWEENEY but did not know COMMONS. HEARD stated that on August 25, 2023, at approximately 9:00 am, HEARD was with M. WILLIAMS near the area of 117th and St. Clair Avenue, Cleveland, Ohio. HEARD stated he and M. WILLIAMS then traveled together to pick up SWEENEY. HEARD stated that SWEENEY was picked up near the area of 222nd and Euclid Avenue, Cleveland, Ohio. HEARD stated they then traveled to the area of Gordon Park located at 801 E. 72nd Street, Cleveland, Ohio and picked up COMMONS. HEARD stated they all then traveled to the gas station located at 5307 Woodland Ave, Cleveland, Ohio 44104.

80. HEARD stated that he did not have knowledge of a robbery, but learned about it when they (M. WILLIAMS, SWEENEY, COMMONS, and HEARD) arrived at the gas station, and began speaking/listening to ATF UC personnel about the specifics of the robbery. HEARD stated that he didn't have a role in the robbery. HEARD mentioned that he knew there were 12 kilograms of narcotics involved in the robbery, but learned that while meeting with the ATF UC personnel. HEARD denied having knowledge of any additional details.

### **Conclusion**

81. Your affiant believes based on the foregoing that there is probable cause to believe that violations of 21 U.S.C. §§ 841(a)(1) and 846 (that is, Possession with Intent to Distribute and Distribution of Controlled Substance, and Conspiracy to Commit the Same), and

18 U.S.C. § 924(c) (that is, Possession of Firearm in Furtherance of Drug Trafficking Crime or Crime of Violence), have been committed, are being committed, and will be committed by **Derrick WILLIAMS, Markus WILLIAMS, Maurice COMMONS, Antonio SWEENEY and Alante HEARD.**

  
\_\_\_\_\_  
Nathan Schwartz  
Special Agent  
ATF

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email, per Fed. R. Crim. P. 4.1 and 41(d)(3) this 25 day of August, 2023.

  
\_\_\_\_\_  
Jennifer Dowdell Armstrong  
UNITED STATES MAGISTRATE JUDGE

August 25, 2023 at 8:25 p.m.

\_\_\_\_\_  
DATE